EXHIBIT A

CAUSE NO. DC-14-04220

CAROL CAVNESS, Plaintiff, v. TERESA KOWALCZYK, M.D., HUNT MEMORIAL HOSPITAL DISTRICT CHARITABLE HEALTH FOUNDATION d/b/a HUNT REGIONAL HEALTHCARE FOUNDATION and HUNT REGIONAL MEDICAL CENTER AT GREENVILLE, BAYLOR HEALTHCARE SYSTEM, JOHNSON & JOHNSON and ETHICON, INC.,	§ § § § § § § § § § § § § §	IN THE DISTRICT COURT 95th JUDICIAL DISTRICT DALLAS COUNTY, TEXAS

PLAINTIFF'S MOTION FOR *IN CAMERA* INSPECTION OF WITHHELD DOCUMENTS BY DEFENDANTS JOHNSON & JOHNSON AND ETHICON, INC. BASED ON ASSERTIONS OF PRIVILEGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff Carol Cavness, and moves the Court for an *in camera* inspection of withheld documents by Defendants Johnson & Johnson and Ethicon, Inc. (collectively, "Defendants") based on assertion of privilege, and in support of thereof, respectfully shows the court as follows:

BACKGROUND

1. On November 7, 2014, Plaintiff's counsel requested that Defendants produce a privilege log pursuant to the Texas Rules of Civil Procedure.[1]

2. On November 24, 2014, Defendants produced a privilege log pursuant to the Texas Rules of Civil Procedure. Contained therein are documents either withheld, or produced and redacted,

[1] *See* Email from William Blankenship to Carol Traylor and others dated 11/7/14, attached hereto as Exhibit "A."

due to asserted privilege. In total, Defendants' privilege log spans 5,778 pages and encompasses 21,780 documents. The privilege log has not been filed herewith as it is so voluminous, but will be made available for the Court at any time.

3. On December 5, 2014, Plaintiff's counsel requested that defendants produce a subset of privileged documents for review.[2] Defendants failed to respond to the request.

IN CAMERA INSPECTION

4. Texas Rule of Civil Procedure 193.4(a) allows a party to request a hearing on assertions of privilege by another party. TEX. R. CIV. P. 193.4(a). In response, the party asserting privilege must establish a prima facie case for its assertions of privilege by producing evidence (affidavits or live testimony). *Id.*; *In re Living Ctrs.*, 175 S.W.3d 253, 261 (Tex. 2005); *In re Monsanto Co.*, 998 S.W.2d 917, 924-25 (Tex.App.-Waco 1999, orig. proceeding). If a prima facie case for claims of privilege can be made by the party asserting privilege, documents identified for inspection by the Court must then be inspected *in camera*. *Id.*

5. Here, Plaintiff has found several assertions of privilege that are concerning. For example, redactions were made based upon an alleged privilege of "non-responsiveness." Moreover, numerous assertions of privilege were made based upon a claim of attorney-client privilege or attorney work product where an attorney was just "cc'd." *See In re Monsanto Co.*, 998 S.W.2d at 930 ("We recognize that it might be argued that all communications between corporate representatives could be claimed as privileged on the basis that 'the legal department can better represent us if we keep them informed.' We reject that assertion. We do not believe that it is necessary for the legal department to be advised of every development out in the field, no matter how minute"). Numerous withheld emails and documents involve non-employee third parties, suggesting an absence of confidentiality and waiver of privilege by Defendants' conduct. *See*

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[2] *See* Letter from Tim Goss to Carol Traylor and others dated December 5, 2014, attached hereto as Exhibit "B."

Osborne v. Johnson, 954 S.W.2d 180, 184 (Tex.App.-Waco 1997, orig. proceeding) ("[A]ttorney-client privilege only protects confidential communications…Communications made in the presence of others who do not qualify as representatives of the client or the lawyer are not considered confidential"). It is further unclear whether the withheld documents and information were truly involving legal advice or whether the alleged attorney-client communication really involved an attorney acting in a business capacity instead of a legal capacity. *See SEC v. Brady*, 238 F.R.D. 429, 438-39 (N.D. Tex. 2006) (finding that the first fundamental aspect of the attorney-client privilege is that the communication must have been made for the purpose of obtaining legal advice, rather than business or other advice, *i.e.*, the lawyer's primary role cannot be non-legal, such as giving business advice).

6. Although Plaintiff herein requests that the Court perform an *in camera* inspection and rule upon all privileges and withheld documents and information reflected in the Privilege Log, Plaintiff acknowledges this would require an enormous undertaking for the Court. In an effort to reduce the number of privilege challenges, documents attached hereto as Exhibit "C" were isolated almost entirely from the date of the FDA public health notification - July 13, 2011- to the time of filing - April 21, 2014 - and includes only those documents withheld by Defendants (i.e. redactions were excluded), and unrelated to intellectual property or research contracts. The referenced documents further relate to major events, time periods, or keywords at issue in the pending litigation, such as FDA communications, market withdrawal, 522 studies, and preparation for FDA advisory committee meetings. Plaintiff respectfully requests that the Court perform an *in camera* review of those withheld documents and rule upon the asserted privilege.

7. Nothing herein is intended to be a waiver by Plaintiff of her right to have the Court review and rule upon all privileges asserted by the Defendant for all documents withheld and identified in the Privilege Log.

PRAYER

8. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Defendants make a prima facie case for the privileges and that the Court perform an *in camera* inspection of the documents and information withheld by Defendants based on assertions of privilege, as well as such other relief to which Plaintiff may be entitled.

Respectfully Submitted,

FREESE & GOSS, PLLC

By: ______________________

Tim K. Goss
State Bar No. 08222660
tim@freeseandgoss.com
3031 Allen Street, Suite 200
Dallas, TX 75204
Telephone: (214) 761-6610
Facsimile: (214) 761-6688

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing pleading was served on all counsel of record in accordance with the Texas Rules of Civil Procedure as follows:

Via Certified Mail, RRR
Philipa Remington
Cathryn Paton
Theibaud, Remington, Thornton, Bailey, LLP
4800 Fountain Place
1445 Ross Avenue
Dallas, TX 75202

Via Certified Mail, RRR
William C. Dunnill
Joel Steed
Steed, Dunnill, Reynolds, Murphy, Lamberth, LLP
One Horizon Ridge
1010 W. Ralph Hall Parkway, Second Floor
Rockwall, TX 75032

Via Certified Mail, RRR
Carol Traylor
Cantey Hanger LLP
600 West 6th Street, Suite 300
Fort Worth, Texas 76102

Certified to the 12th day of December, 2014 by:

Tim K. Goss

CERTIFICATE OF CONFERENCE

Counsel have conducted a conference regarding the relief requested in this motion. Despite best efforts, an agreement could not be reached regarding the requested relief.

Certified to the 12th day of December, 2014 by:

Tim K. Goss

EXHIBIT A

↑ Next ⇑ Last

From: bill@billblankenshiplaw.com [mailto:bill@billblankenshiplaw.com]
Sent: Friday, November 07, 2014 2:43 PM
To: ctraylor@canteyhanger.com
Cc: Philipa Remington (premington@trtblaw.com); Cathryn Paton (cpaton@trtblaw.com); Billy Dunnill (BillyDunnill@steedflagg.com) (BillyDunnill@steedflagg.com); tim@freeseandgoss.com; Richard Capshaw (Richard@capslaw.com)
Subject: Cavness

Carol-

Your responses to discovery in this case include assertions of privilege and indicate that material and information have been withheld pursuant to those privileges. Plaintiff hereby requests that Johnson & Johnson and Ethicon, Inc. identify the information and material so withheld, pursuant to TRCP 193.3(b). Thanks.

William F. Blankenship III
Board Certified in Personal Injury Trial Law
Law Office of William F. Blankenship III, PC
3219 McKinney Avenue, Suite #100
Dallas, Texas 75204
(214) 361-7500
(214) 361-7505 Fax

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EXHIBIT B

Freese & Goss PLLC

ATTORNEYS AT LAW

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DALLAS, TEXAS 75204

TELEPHONE: 214.761.6610
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www.freeseandgoss.com

Tim K. Goss, Esq.
Direct Line: 214.761.6617
Email: tim@freeseandgoss.com

December 5, 2014

Via Email
Carol Traylor, Esq.
Cantey Hanger LLP
600 West 6th Street, Suite 300
Fort Worth, Texas 76102

RE: Carol Cavness vs. Teresa Kowalczyk, M.D. et al., Cause No. DC-14-04220.

Dear Carol,

On November 24, 2014, our office received an electronic copy of Ethicon's privilege log. The submitted privilege log reflects 21,780 documents as currently withheld or redacted, totaling 5,788 pages of asserted privilege.

We intend to file a motion, pursuant to Tex. R. Civ. P. 193.4, requesting a hearing on many of Ethicon's objections and claims of privilege, as more particularly described below. We also will request an *in camera* review of those withheld or redacted documents.

The attached exhibit contains a subset of 1,570 privileged documents we intend to include in our request. In an effort to reduce the number of privilege challenges, these documents were isolated almost entirely from the period of July 13, 2011, to the time of filing, April 21, 2014, and exclude documents that appear to be related to intellectual property or research contracts. The referenced documents also relate to major events, time periods, or keywords; including the FDA advisory committee meeting, FDA correspondences and communications, 522 studies, commercial product viability, interactions with AdvaMed, and/or references to Prosima.

Please let me know if Ethicon will agree to withdraw its asserted privileges and produce the referenced documents. If I do not hear from you by Tuesday, December 9, 2014, I will assume Ethicon opposes the requested relief and will file the motion.

In addition, we intend to notice the deposition of a corporate representative regarding the matters set forth in the attached draft notice. Please provide me with convenient dates for the deposition during the month of January 2015.

Should you want to discuss any of the foregoing, please call me.

Sincerely,

Tim K. Goss

TKG/ar
Enclosures

cc:
Via Email
Philipa Remington
Cathryn Paton
Theibaud, Remington, Thornton, Bailey, LLP

Via Email
William C. Dunnill
Joel Steed
Steed, Dunnill, Reynolds, Murphy, Lamberth, LLP

EXHIBIT C

PL04113	PL14318	PL24594	PL11944	PL06360	PL06374	PL06841	PL06358	PL06464	PL06476	PL06470	PL15572	PL06200	PL16121	PL15566	PL06346	PL08402
PL06689	PL14319	PL14294	PL14133	PL06361	PL06375	PL13098	PL06449	PL06465	PL06512	PL06471	PL16103	PL06275	PL16124	PL15569	PL06389	PL13052
PL20756	PL14320	PL14646	PL06239	PL06362	PL06377	PL13102	PL06458	PL15587	PL06513	PL06472	PL16104	PL06293	PL16610	PL15575	PL06390	PL14137
PL07654	PL14419	PL13120	PL28418	PL14328	PL13050	PL14134	PL06459	PL16092	PL06843	PL06473	PL16105	PL06294	PL06382	PL15577	PL06808	PL14138
PL23832	PL14644	PL19309	PL28431	PL16091	PL13116	PL14189	PL06460	PL16093	PL15564	PL06474	PL16107	PL06295	PL06497	PL15578	PL08224	PL14139
PL08522	PL17524	PL23830	PL28432	PL16097	PL13117	PL14331	PL06461	PL16094	PL15568	PL06475	PL16109	PL06491	PL06498	PL16114	PL14136	PL14156
PL08524	PL17529	PL13119	PL28434	PL06192	PL16087	PL15586	PL06462	PL16095	PL15571	PL06477	PL16130	PL14135	PL06510	PL16115	PL14154	PL14157
PL06349	PL17572	PL14123	PL28484	PL06365	PL17175	PL16139	PL06506	PL16098	PL15573	PL06478	PL06304	PL14187	PL06511	PL16117	PL14155	PL17363
PL06350	PL18059	PL14267	PL05738	PL06366	PL17176	PL16140	PL06507	PL16099	PL15576	PL06479	PL06306	PL14194	PL06514	PL16118	PL06384	PL06392
PL06351	PL27751	PL06272	PL27743	PL06368	PL17177	PL06355	PL07162	PL16611	PL15580	PL06480	PL06481	PL14269	PL06515	PL16119	PL06385	PL06393
PL13081	PL14159	PL06273	PL08480	PL06369	PL17498	PL06356	PL14411	PL16612	PL16081	PL06482	PL06825	PL14270	PL06516	PL16145	PL06527	PL14140
PL14122	PL14160	PL14308	PL08615	PL06370	PL17499	PL06357	PL14466	PL16613	PL16082	PL06483	PL13113	PL14271	PL06517	PL16146	PL06633	PL14141
PL16599	PL14164	PL18030	PL11940	PL06371	PL04122	PL06450	PL15588	PL19222	PL16083	PL06484	PL14341	PL14276	PL06518	PL16147	PL06807	PL18459
PL23881	PL18382	PL05614	PL14306	PL06372	PL04123	PL06451	PL15589	PL19223	PL16132	PL06485	PL16127	PL14277	PL06519	PL16148	PL14124	PL14348
PL23882	PL18404	PL14302	PL14170	PL14114	PL04446	PL06452	PL15590	PL16100	PL16133	PL06486	PL16128	PL14278	PL06520	PL16634	PL14268	PL05784
PL10941	PL27741	PL06197	PL14310	PL16088	PL04447	PL06453	PL16085	PL16101	PL16144	PL06487	PL16129	PL14279	PL06521	PL16639	PL27745	PL06167
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PL18407	PL14296	PL11945	PL06220	PL06179	PL04452	PL06456	PL16090	PL03074	PL16602	PL06490	PL17496	PL15563	PL13111	PL16654	PL07602	PL11939
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PL05556	PL14300	PL16151	PL14461	PL06181	PL04477	PL16084	PL06297	PL16137	PL06300	PL11950	PL19313	PL15574	PL14273	PL06499	PL07780	PL14117
PL10943	PL17511	PL04577	PL14462	PL06182	PL06242	PL06457	PL06298	PL16138	PL06301	PL11951	PL03047	PL15581	PL14340	PL06718	PL07882	PL14118
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PL14131	PL24429	PL06263	PL17513	PL06367	PL06296	PL16141	PL06376	PL06466	PL06468	PL13112	PL03078	PL16110	PL15561	PL06344	PL08159	PL18060
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PL14478	PL06254	PL23751	PL06435	PL06233	PL12276	PL11686	PL14547	PL14588	PL15532	PL14609	PL06632	PL12363	PL15831	PL21666	PL27457	PL15848
PL06186	PL06255	PL06212	PL06436	PL06234	PL12309	PL11817	PL14548	PL14594	PL15795	PL14611	PL06691	PL14617	PL15832	PL21667	PL27458	PL15849
PL06187	PL06402	PL06291	PL06437	PL06235	PL12317	PL11818	PL14315	PL14598	PL15797	PL14612	PL06692	PL14618	PL15833	PL21839	PL27459	PL18324
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PL06397	PL06404	PL06214	PL06439	PL11963	PL12359	PL04617	PL05697	PL15792	PL06550	PL14625	PL06700	PL14620	PL15835	PL21842	PL27461	PL06785
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PL18697	PL06408	PL14354	PL06441	PL14356	PL12729	PL26543	PL14370	PL17567	PL16228	PL15801	PL06702	PL14622	PL15837	PL21910	PL06630	PL12250
PL18698	PL13077	PL06172	PL06442	PL16156	PL12734	PL26545	PL14371	PL17964	PL21844	PL15805	PL06721	PL14623	PL15838	PL21911	PL06784	PL17948
PL06195	PL14350	PL06248	PL06443	PL03044	PL06224	PL26547	PL14374	PL23828	PL21909	PL11662	PL06722	PL14624	PL17587	PL21912	PL17594	PL17950
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PL11633	PL12653	PL06755	PL12596	PL12223	PL12652	PL11708	PL17903	PL11700	PL12610	PL12699	PL16386	PL16690	PL20116	PL23864	PL25628	PL14917
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PL11721	PL16403	PL06758	PL16537	PL16401	PL11624	PL12724	PL05693	PL12226	PL12632	PL15870	PL16398	PL16693	PL20789	PL25620	PL28188	PL28205
PL12152	PL17916	PL06759	PL17870	PL17898	PL11625	PL15531	PL05694	PL12227	PL12633	PL15872	PL16399	PL16694	PL23858	PL25622	PL28189	PL06609
PL12160	PL17924	PL06760	PL17901	PL17899	PL11702	PL15551	PL05695	PL12280	PL12639	PL15873	PL16535	PL16695	PL23859	PL25623	PL28190	PL15874
PL12262	PL17926	PL12151	PL27142	PL17902	PL11703	PL15854	PL06766	PL12281	PL12640	PL15875	PL16659	PL16696	PL23860	PL25624	PL28201	PL17561
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PL20480	PL16381	PL16699	PL28104	PL14831	PL14868	PL19377	PL25228	PL06747	PL13859	PL14557	PL11727	PL17914	PL15776	PL06305	PL02014	PL25332
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PL06773	PL16391	PL16705	PL28177	PL14887	PL14871	PL19390	PL28117	PL13060	PL23970	PL14589	PL15864	PL15887	PL19399	PL06310	PL03109	PL25345
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PL06775	PL16394	PL17418	PL28179	PL14889	PL15765	PL19392	PL28388	PL17841	PL13071	PL14599	PL02634	PL15891	PL27240	PL14338	PL03198	PL28108
PL11852	PL16395	PL17894	PL28180	PL14899	PL15766	PL19393	PL28492	PL17842	PL11665	PL14593	PL12242	PL15893	PL20316	PL16126	PL11958	PL28109
PL12210	PL16397	PL17895	PL28181	PL14900	PL15927	PL19121	PL28493	PL17984	PL11777	PL14602	PL12599	PL15909	PL20317	PL06314	PL11956	PL28111
PL12328	PL16408	PL18764	PL28182	PL15537	PL15928	PL19122	PL28494	PL17985	PL11778	PL14603	PL16199	PL16414	PL02130	PL06315	PL11957	PL07233
PL12355	PL16409	PL23187	PL28184	PL15540	PL15929	PL19123	PL28495	PL14407	PL12197	PL14604	PL11711	PL16416	PL02131	PL14335	PL04025	PL16159
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PL15555	PL16657	PL24437	PL28191	PL12528	PL19395	PL15660	PL28500	PL13797	PL12246	PL17961	PL12350	PL06353	PL06223	PL06312	PL23752	PL21181
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PL15562	PL16666	PL24439	PL28193	PL16418	PL15955	PL16451	PL28595	PL28496	PL20130	PL06566	PL12345	PL27194	PL06199	PL02605	PL16203	PL00220
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PL15642	PL16669	PL24473	PL28195	PL15915	PL15957	PL15641	PL00278	PL28553	PL06707	PL24595	PL12318	PL25286	PL14332	PL07977	PL06222	PL11930
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PL15768	PL16671	PL24608	PL28197	PL07479	PL15971	PL28133	PL08667	PL28498	PL16546	PL14022	PL17917	PL27196	PL06183	PL06394	PL06339	PL12275
PL15880	PL16672	PL25333	PL28198	PL06554	PL15972	PL28134	PL06500	PL28499	PL17962	PL15807	PL17918	PL15777	PL06184	PL06274	PL28008	PL12316
PL15882	PL16674	PL25334	PL28199	PL11118	PL15973	PL18823	PL11681	PL28554	PL17963	PL11767	PL12183	PL15949	PL06185	PL02328	PL25351	PL12467
PL15883	PL16675	PL25335	PL28200	PL21684	PL15974	PL28130	PL11811	PL28556	PL16547	PL12746	PL12289	PL15773	PL16102	PL02345	PL28066	PL12493
PL15884	PL16676	PL25336	PL06610	PL06652	PL15975	PL28131	PL20793	PL28501	PL16548	PL06790	PL15852	PL15774	PL16861	PL02346	PL28110	PL12613
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PL06226	PL07132	PL12356	PL12671	PL06287	PL07461	PL12544	PL14360	PL12174	PL00189	PL12728	PL06243	PL12232	PL00179	PL12479	PL06252	PL12288
PL06286	PL07175	PL12358	PL12775	PL06288	PL06805	PL12604	PL06176	PL12206	PL00190	PL12733	PL06251	PL12235	PL06238	PL12540	PL06342	PL12308
PL06555	PL12555	PL06341	PL15953	PL12570	PL12568											